

ITAD Services

This guide has been created to provide customers with step-by-step insights into Covenco's ITAD procedures. It also aims to make it straightforward for customers to follow the guidance and remain in line with the GDPR framework.



INTRODUCTION

For any organisation within the UK and European Union, the General Data Protection Regulation (GDPR) requires that data-bearing assets that you want to dispose of must go through a fully audited IT Asset Disposition (ITAD) process, with a documented Chain-of-Custody and detailed serialised reporting on asset erasure and destruction to maintain your regulatory compliance.

To meet these requirements, organisations are increasingly turning to specialist ITAD service providers, such as Covenco, to ensure legal compliance through consistent data sanitisation and detailed reporting to reduce risk and provide the necessary evidence to their auditors.

Organisations must ensure that their ITAD partner follows the pre-requisite best practices and standards. This guide demonstrates Covenco's processes and our commitment to our ISO 27001 accreditation.

Covenco's approach

Covenco's ITAD processing, following recognised guidelines approved by the ICO. These standards are designed to protect the integrity and security of all data during an end-of-life process and ensure compliance with the GDPR (UK) framework.

Covenco also applies a strict set of procedures to maintain compliance with our ISO27001 standards.

This guide has been created to provide customers with step-by-step insights into these procedures. It also aims to make it straightforward for customers to follow the guidance and remain in line with the GDPR framework.





What does an ITAD process provide?

The outcome of any ITAD process must provide a complete chain of custody and compliance-ready certification for any assets that have been through the process.

Covenco's ITAD process follows best practice guidelines and delivers a complete and audit-ready set of documentation, including:

- › A signed Covenco GDPR processor contract.
- › A signed Statement of works.
- › Fully completed site audit documentation.
- › A signed and complete asset collection document.
- › A complete asset register, including a unique ITAD identification number for each item.
- › Dedicated point to point couriers, multi crewed to ensure the cargo is never left unattended.
- › A comprehensive Processing Certificate and Report for your auditors.

ITAD Data Security

Data Security is at the very heart of our standards for asset disposition. As such, the chain of custody and handling of data-bearing assets requires significant physical and digital security measures, including:

- › Physical storage of data-bearing assets within secure, locked areas with no possible unauthorised access.
- › Assets are never left unattended while in transit or collected and delivered. Vehicles delivering assets are physically guarded at all times.
- › Assets are never left in any waiting area for any reason and are taken directly to a secure area dedicated to ITAD processing.
- › Covenco's premises have strict access control to always prevent unauthorised access. The secure ITAD processing area is also strictly limited to authorised personnel only.
- › Visitors, couriers, and anyone not cleared for access will always have an escort while on the premises.

Classification Services

Customers who engage with Covenco for ITAD services will be asked to complete their Data Impact Assurance Level classification. This is a core part of the asset recovery standard, and it helps customers to choose and specify the appropriate treatments to meet their risk and compliance needs.

Covenco will help customers with a manual classification calculation. Once the classification has been completed, we work with customers to identify the most appropriate treatment for their data-bearing assets:

- › Agreeing upon the type of disposition for each asset, such as data wiping or physical destruction.
- › Agree upon the exact equipment to be collected (or delivered). It is essential that when we arrange the receipt of assets for disposition, we know precisely what equipment and in what quantities we are collecting. This helps customers be confident that:
 - › All equipment has been collected and received as agreed.
 - › All required ITAD processes are applied and completed on the specified equipment.





Covenco creates an ITAD Record of Processing Activities (RoPA) Register for all new customers. This register meets the requirements of Article 30 of the General Data Protection Regulation (GDPR).

The Covenco Client Engagement Process

All enquiries for Covenco ITAD Services are followed up with a comprehensive proposal. This document details whether we are purchasing your assets or providing an ITAD process following which equipment will be returned to you or destroyed by Covenco.

Covenco uses a GDPR Processor Contract as a part of our proposal, which, when signed and countersigned, will form the basis of the contract between Covenco and the customer. All other documentation pertaining to the ITAD service is added to this single file by way of appendices and can include:

- A detailed Schedule of Works (SoW)
- A comprehensive asset register and collection document detailing all items to be collected with make/model and serial numbers recorded.
- A full site audit report

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ITAD Site Audit

Covenco conducts a site audit to establish the logistics of any arranged collection. We provide customers with a complete asset register and collection specification based on this audit.

The audit records essential information such as the exact location and status of equipment, racked, loose, palletized, etc., and any potential obstacles due to oversized equipment, movement constraints such as narrow doors/corridors, stairs, and any other issues that may affect the removal of the equipment.

When completed, the collection audit is added to the CUK GDPR processor contract.

The site audit also addresses site security, such as site access requirements, parking (including any height restrictions), secured perimeters, and any additional security measures that may affect the process.

On collection day, Covenco's team will check that the asset inventory matches the ITAD register. Any discrepancies will be reported and agreed upon with the customer.



ITAD Asset Collection Services

Covenco offers two levels of secure ITAD collection service. The sensitivity of the data will dictate which service is most appropriate for the customers' needs:

1. Secure collection.

Lockable cages are provided within our dedicated point-to-point courier services with a two-man vetted crew to ensure the cargo is never left unattended. All ITAD assets are secured from de-installation, and upon reaching our secure facility, they are segregated and sanitised. The vehicles all meet the physical security requirements within our Asset Recovery Standard.

2. Secure customer delivery.

Customers can choose to deliver their ITAD assets to our secure facility in Banbury, Oxfordshire. In this case, we require tracking details, and we maintain a specific delivery date and time. The consignment becomes Covenco's responsibility upon reaching our Banbury facility and following a formal handover process.

Transfer of Custody

Covenco accepts custody at the point of delivery to our secure facility in Banbury UK, or upon collection from the client site by authorised Covenco personnel.

Record Keeping

Details of all ITAD assets collected will be kept on file, and a destruction certificate will be provided, including serial numbers and validation of the destruction.

Processing Time

Covenco processes all assets received within 21 working days of collection.

DATA DESTRUCTION

Covenco offers two types of certified Data Destruction Services:

1. Physical Destruction

Physical destruction is carried out using a disk 'press' that renders the drives beyond repair or use. We also ensure that all NAND cells and potential data-bearing chips are pulverised beyond any chance of operability.

During this process, all disks and cells are crushed beyond repair, meaning the item cannot be re-sold or re-used thereafter. This service is used when a customer must have certified evidence that a data-bearing asset has been completely destroyed. A certificate of destruction is provided for every item that we process.

2. Sanitisation

Covenco can securely erase disk drives of data but preserve the integrity of the drive. This is desirable when the customer does not require physical destruction, and the device can be resold at a fair market price.

A certificate of sanitisation is provided along with full details of the sanitisation process. Please note that any drive that cannot be sanitised for any reason is consigned for physical destruction and immediately quarantined pending that destruction.

Covenco's pre-sales consultation process helps customers determine which method is most suitable, and the final instruction for the type of processing remains the customers' decision.



Sanitisation Quality Control

During the sanitisation process, a quality control check is completed on a batch sample basis to confirm that the sanitisation process has been effective. This check is done by attempting to read data from the sanitised drive. No data other than basic drive parameters should be able to be recovered, and this testing is documented for the final certification.

The effectiveness of our destruction and sanitisation processes is subject to periodic testing, during which a sample is subjected to forensic analysis.

Asset Disposal

For assets that have been destroyed as a part of our ITAD and processes, Covenco operates a system of disposal for both ferrous and non-ferrous metal waste and is fully compliant with WEEE regulations.

Covenco is certified to ISO 14001 for waste management and disposal, including maintaining an approved register of companies used for downstream waste disposal with a record of permits, licenses, and expiry dates, all held on our ISO 14001 environmental system.

Recording and Reporting

All data-bearing assets undergoing Covenco ITAD processes are recorded, tracked, and fully certified.

Where an item is marked for destruction, a certificate is generated and entered into the asset register. Customers receive copies of the certificates for their compliance audit records. Covenco maintains all records relating to ITAD services in a secure location for a minimum of ten years.

Conclusion

Covenco's ITAD Program provides the necessary chain-of-custody control, data destruction options, compliant recycling, detailed reporting, downstream audit control, and solid re-marketing returns that our customers demand.

Covenco is also uniquely able to offer additional managed IT services that create additional value, such as our asset inventory and management audit services, infrastructure design and deployment, engineering, and data management solutions.

Our ISO 27001 accreditation provides customers with complete peace of mind by delivering comprehensive audit-ready compliance and reporting at a forensic level.

By selecting Covenco as your chosen ITAD partner, you can rest assured that you are able to improve the control and safety of the data you manage.

About Covenco

Covenco connects data management services with IT hardware supply and support. With over 34 years of experience in the IT industry, our team offers a reliable source of expertise for data centre administrators.

Covenco supports businesses with world-class data protection, backup, and disaster recovery services. Our UK data centres have over two Petabytes of customer data under management at any time, and we are fully ISO27001 accredited for data security.

Covenco supplies new, unused, and refurbished computer hardware from leading vendors, including IBM, HP, Dell/EMC, Lenovo, and Cisco. With global same-day shipping available, we have everything you could require at a fraction of the retail cost.

Our lifecycle solutions include fully certified Asset Recovery and Disposition (ITAD) Services, and we regularly buy back hardware as a part of a data centre refresh. For more information, visit: covenco.com

Contact Covenco

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